

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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I'MECCA BURTON PEARSON, a minor, by her
mother and natural guardian Taniesha Pearson,

Plaintiff,

08-CV-3208 (SLT) (MDG)

vs.

**AFFIDAVIT OF TANEISHA
PEARSON**

THE CITY OF NEW YORK, THE NEW YORK
CITY BOARD OF EDUCATION, d/b/a THE NEW
YORK CITY DEPARTMENT OF EDUCATION,
POLICE OFFICERS JOSEPH CORTES, SHIELD
#27040 AND DENNIS MCALLISTER, SHIELD
#9523

Defendants.

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STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Taneisha Pearson (incorrectly named in the complaint as Taniesha), being duly
sworn, deposes and says:

1. I am the mother and natural guardian of minor Plaintiff I'mecca Burton
Pearson. I am familiar with the facts of the present litigation. I presently reside at 308 Beach
86th Street, Queens, New York, 11693.

2. I'mecca was born on June 23, 1997 and was ten years old at the time of
the incident giving rise to this litigation. She is currently twelve years old.

3. I'mecca resides with me at the above address.

4. I commenced this lawsuit on behalf of I'mecca against the City of New York, the New York City Department of Education and members of the New York City Police Department.

5. On January 15, 2008, while on her school bus, I'mecca was verbally, physically, mentally and emotionally abused and assaulted by two police officers, Joseph Cortes and Dennis McAllister, including being handcuffed behind her back with metal handcuffs.

6. I'mecca did not receive any permanent physical harm and consequently she did not receive any medical treatment for physical injuries as a result of this incident. I'mecca did incur psychological injuries, and received treatment for emotional injuries at New York Psychotherapy and Counseling Center. I'mecca saw therapist Anne O'Halloran and psychiatrist Dr. Pierre Louis for approximately one month in August 2008, and continued through 2009. Presently, I'mecca is in good physical health, but still suffers emotional trauma as a result of the actions of the named members of the New York Police Department.

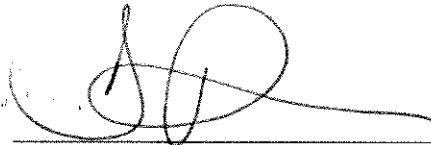
7. I'mecca has not been reimbursed for any medical expenses as a result of this incident because her Medicaid benefits paid for the cost of the treatment she received for her emotional injuries.

8. I approve of the distribution of the settlement where I'mecca will receive as follows: \$25,000 (twenty-five thousand dollars), Hughes Hubbard & Reed LLP will receive \$15,000 (fifteen thousand dollars) in attorneys' fees and costs, and Norman Siegel will receive \$10,000 (ten thousand dollars) in attorneys' fees and costs.

9. I'mecca's recovery will be invested in a CD account at Roosevelt Savings Bank located at 1024 Gates Avenue, Brooklyn, New York 11221, until she reaches the age of eighteen.

10. There are no other motions or petition for settlement of the same claim, of an action to recover on the same claim or of the same action.

11. Neither I nor any member of my family have made a claim for damages suffered as a result of the same occurrence giving rise to I'mecca's claim.



Taneisha Pearson

Sworn to before me this
9th day of March, 2010.



Notary Public

VINNIE TERIACA
Notary Public, State of New York
No. 01TE4855939
Qualified in New York County
Commission Expires April 7, 2010